

Camelid ID Working Group  
Teri Nilson Baird, Co-Chair  
28825 CR 5  
Elizabeth, CO 80107

June 30, 2005

Docket No. 05-015-1  
Regulatory Analysis and Development,  
PPD  
APHIS  
Station 3C71  
4700 River Road Unit 118  
Riverdale, MD 20737-1238

Dear Sirs,

We are writing in response to the Request For Comment on the proposed National Animal Identification System (NAIS - Docket No. 05-015-1).

The Camelid Identification Working Group is made up of stakeholders representing the US camelid industry and is charged with developing a viable plan for permanent identification of alpacas, llamas, guanacos, vicunas and camels. WG members have been making presentations on the proposed NAIS and continue to receive feedback from owners regarding the development of an ID plan for camelids.

There are about 300,000 alpacas, llamas and guanacos in the US and about 3,000 camels (dromedary and bactrian). The WG is currently seeking input and participation from camel owners, therefore the following comments will address permanent identification in alpacas, llamas, guanacos and vicunas, referred to as South American camelids, or SACs.

SAC owners have strongly indicated to the WG that they prefer using implantable microchips for permanent identification in their animals. This is the most common method of permanent identification used for SACs, having been in use in these species since the 1980s when the International Lama Registry first began recording microchip numbers. As of June 2005, the Alpaca Registry Inc. has recorded microchip numbers for 50% of registered alpacas and the International Lama Registry has recorded microchip numbers for approximately 16,000 registered llamas. The actual number of microchipped animals of both species is likely higher than this since reporting microchips to each registry is not required.

Microchips currently used in SACs are either 125- or 128-kHz devices with 9, 10 or 12 digits. Likewise, there is an installed base of scanners in use within the industry to read these frequencies. Veterinarians seeing SACs in their practices are most likely to also have scanners to read 125 kHz microchips due to the preponderance of small animals and equines also identified using this frequency. This existing infrastructure of microchips and scanners already provides an effective and efficient way to track SAC movement.

Owners of South American camelids have asked the WG to ensure existing 125- and 128-kHz microchips will be accepted by USDA for the lifetime of the animal and that they not be required to re-chip animals with 134.2 kHz microchips. Given the overwhelming industry support and level of voluntary compliance currently existing within the industry, the WG supports this approach and requests currently in use microchips be "grandfathered" into the NAIS and be accepted as permanent identification in camelids. The cost to re-chip animals already identified with the lower frequency microchips would be an unfair burden on owners and is unnecessary given the existing microchips are fully functional and could be linked to an AIN number via the animal's breed registry number. As the 134.2 kHz chips and scanners to read them become readily available, SAC owners would be encouraged to begin using that frequency.

Sincerely,

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Co-Chairs,  
Camelid ID Working Group